Office of Public Works
Pretreatment Program
316 North Park Avenue
Helena, MT 59623

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helenamt.gov

January 5, 2022

STEPHANIE DULL
ENERGY LABS
3161 E LYNDALE AVE
HELENA, MT 59601

Dear Ms. Dull:

Thank you for returning the Industrial Waste Survey to the City of Helena Pretreatment Program and meeting with me on December 28, 2021. The purpose of these surveys and site visits are to identify and characterize businesses that are discharging non-domestic or industrial waste to Helena's wastewater treatment plant.

Title 6, Chapter 4 of Helena's City Code; Title 75, Chapter 5 of Montana's Water Quality Act: and 40 CFR, part 403 of the Federal Clean Water Act are the legal basis for control of industrial wastes discharged into Helena's wastewater treatment plant. These regulations are all readily available on the internet and 40 CFR part 403 can be accessed at ecfr.gov or a paper copy can be provided upon request.

Based on the information submitted in the questionnaire and obtained during the site visit, no further action is required from Energy Labs at this time. Please note that Energy Labs is responsible for ensuring that it complies with all applicable Federal, State, County, and Local regulations governing the operation of its business including any applicable requirements under Sections 204(b) and 405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act.

If there is a significant change in your operations that requires you to discharge materials not addressed in the survey into the sanitary sewer system, results in increased wastewater flows, introduces a new categorical process, or alters the characteristics of your wastewater, please contact Helena's Pretreatment Program.

Thank you for your time and please feel free to contact me if you have any questions.

Sincerely,

Edward L. Coleman
Pretreatment Program Manager

INDUSTRIAL WASTE INITIAL INSPECTION FORM

Inspector(s):	Ed Coleman	**Inspection Date:**	12/28/2021
		Inspection Time:	10:15 AM
		Limiting Conditions:	Snow

I. GENERAL:

Business Name:	Energy Laboratories Inc		
Address:	3161 E Lyndale Ave, Helena		
Phone:	406.442.0711		
Name and Title of Facility Representative(s) At Inspection:	Stephanie Dull, Safety Officer		
Name and Title of Correspondence Contact Person:	Same		
Type of Business/Operations:	Environmental Laboratory		
Average Production Rate:			
Number of Employees:		**Shifts:**	1
Normal Days of Operation:	× 5 days/week	☐ 7 days/week	☐ other _____
Water Supplied By:	City of Helena		
Is there an Industrial Waste Permit on file for occupant?	☐ YES	× NO	

II. CHEMICAL INVENTORY:

Chemicals Name:	Use:	Storage Location:	Storage Container No. and size:
	See Attached Chemical Inventory		

Chemicals Name:	Use:	Storage Location:	Storage Container No. and size:

III. CHEMICAL STORAGE AND SPILL CONTAINMENT:

Evidence of spills on site:	No
Location of floor drains in storage or use area:	Floor drains in use areas and indoor storage areas under emergency showers (photo #3)
Spill containment description:	Primary chemical storage areas were indoors.
Outside chemicals storage area description:	Waste storage was on a concrete slab within a fenced and covered area with secondary containment under several of the drums (photo #5)
Spill path and potential to sanitary sewer or storm sewer description:	Indoor drums could be spilled into floor drains that go to the sanitary sewer (photo #4)
Notes:	Many of the chemicals on the shelves are solids (photo #2).

IV. OPERATIONS AND SPILL CONTAINMENT:

Description of processes/ operations at the facility:	Lab operations conducting sampling and analyses of water and soil samples. Water samples can have the following preservatives in them in small quantities: nitric acid, sulphuric acid, or hydrochloric acid	
Restaurant/ food preparation present?	☐YES × NO	**If YES, include additional oil/grease information:**
Photography, x-ray, or print shop?	☐YES × NO	**If YES, include additional silver information:**

Sand interceptor:

Operation/Use	Present? (Y/N)	If YES, are floor drains present? (Y/N)	If YES, do floor drains connect to an interceptor? (Y/N)
	N		

How are supply chemicals handled/ transferred to processing equipment/ area for use?	Chemicals are provided to the customer for sample preservation and are provided to the customer in hard sided coolers. The customer returns their sample with the preservatives in the sample in the hard sided cooler. The lab tech takes the cooler into the laboratory and conducts the analysis. The leftover preserved sample is then hand carried to the neutralization area where the extra water from the sample is then placed in a holding/neutralizing container of ~60 gallons (photo#1). Once enough spent sample material is in the neutralizing container, the lab neutralizes the material with liquid caustic soda, and they test it with a pH strip. Once the material is an acceptable pH, they discharge that material into the POTW. This discharge of neutralized sample water occurs 1-3 times a week at varying amounts. It should be noted that there are no floor drains in the neutralizing room.
Products:	

PROCESS/OPERATIONS continued:

Floor drain(s) located in process areas?	**× YES ☐ NO**	**Potential for spill to reach sanitary sewer?**	**× YES ☐ NO**
If YES, location of each drain: Floor drains are located under emergency showers			
Adequate spill containment in process areas?	**☐ YES × NO**		
If NO, explain: The chemicals in the processing area are typically in use and the safety showers are required for the safety of the employees			

IV. WASTE:

Waste Streams Discharged to Sanitary Sewer	Volume Generated (Per Day, Month, etc.)	Discharge Frequency
Neutralized sample water	Approximated 60-180 gallons of neutralized water into the POTW a week. Energy uses approximately 1252 gallons per day of domestic water	1 to 3 times per week
Does the Facility treat the process water in any way *before* discharging to the sanitary sewer?	**× YES**	**☐ NO**
If YES, describe the system and identify the waste streams treated: Leftover preserved water samples are hand carried to the neutralization area where the extra water from the sample is then placed in a holding/neutralizing container of ~60 gallons. Once enough spent sample material is in the neutralizing container, the lab neutralizes the material with liquid caustic soda, and they test it with a pH strip. Once the material is an acceptable pH, they discharge that material into the POTW. This discharge of neutralized sample water occurs 1-3 times a week at varying amounts.		

Non-Discharged Waste Streams (*any type of liquid or solid waste that is not discharged to the sanitary sewer, except DOMESTIC TRASH)* Attach manifests and/or receipts, if applicable.

Waste Streams NOT Discharged to Sanitary Sewer:	Hazardous waste, such as waste acids and other laboratory chemicals				
Volume Generated (Per Day, Month, etc.):	Varies				
Storage Location	Inside and Outside				

WASTE continued:

Storage container (AST, UST, drum, tote, etc), number present, and size:	55-gallon drums. One in use inside with two empty. Six in use outside				
Staining/ evidence of spills:	No				
Floor drains in storage area? (Y/N)	Inside storage area				
Location of floor drains in storage area?	Safety shower and drain is within 10 feet of inside drums				
Adequate spill containment? (Y/N)	N				
If stored outside, are wastes covered? (Y/N)	Y				
How is the waste handled/ transferred to its storage area?	Moved by hand				
Potential for spill to reach sanitary sewer or storm sewer? (Y/N)	Y				
Waste Transporter/ Destination	All hazardous waste is hauled away by Mountain States Environmental out of Billings				
Records Adequate? (Y/N)	N/A				
Evidence of improper disposal/ staining around dumpster(s)?	☐ **YES** × **NO**	**If YES, describe:**			

V. STORMWATER:

	Location
Storm drains present?	☐ YES × NO
If YES, and process water can reach them, notify Sewer Maintenance.	

VI. Sample of Discharge:

Type of Sample per SAP	N/A
On site pH of Discharge	
Calibration of pH Meter	
Laboratory Name and Address	
Suite of Parameter per SAP	

VII. ADDITIONAL INFORMATION:

	Additional Information
Cooling Waters:	☐ YES × NO
Boilers:	☐ YES × NO
Spill Plan:	× YES ☐ NO
Other:	

VIII. COMMENTS AND RECOMMENDATIONS:

Comments:	Environmental laboratory that noted it had other wastewater than domestic due to discharging neutralized sample water into the POTW.
Recommendations:	Confirmed with the City's Utility Maintenance Division that there had not been issues with wastewater lines downstream of Energy Labs. Energy Labs is therefore identified as a nonsignificant industrial user that is not significant to pretreatment.
Requirements:	Based on the information submitted in the questionnaire and obtained during the site visit, no further action is required from Energy Labs at this time. Energy Labs is responsible for ensuring that it complies with all applicable Federal, State, County, and Local regulations governing the operation of its business including any applicable requirements under Sections 204(b) and 405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act.

REPORT COMPLETED BY: ***Ed Coleman***

INDUSTRIAL WASTE INITIAL INSPECTION PHOTO LOG

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GENERAL:

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Address:	3161 E Lyndale Ave, Helena

Photo 1: Sample Holding/Neutralizing Container

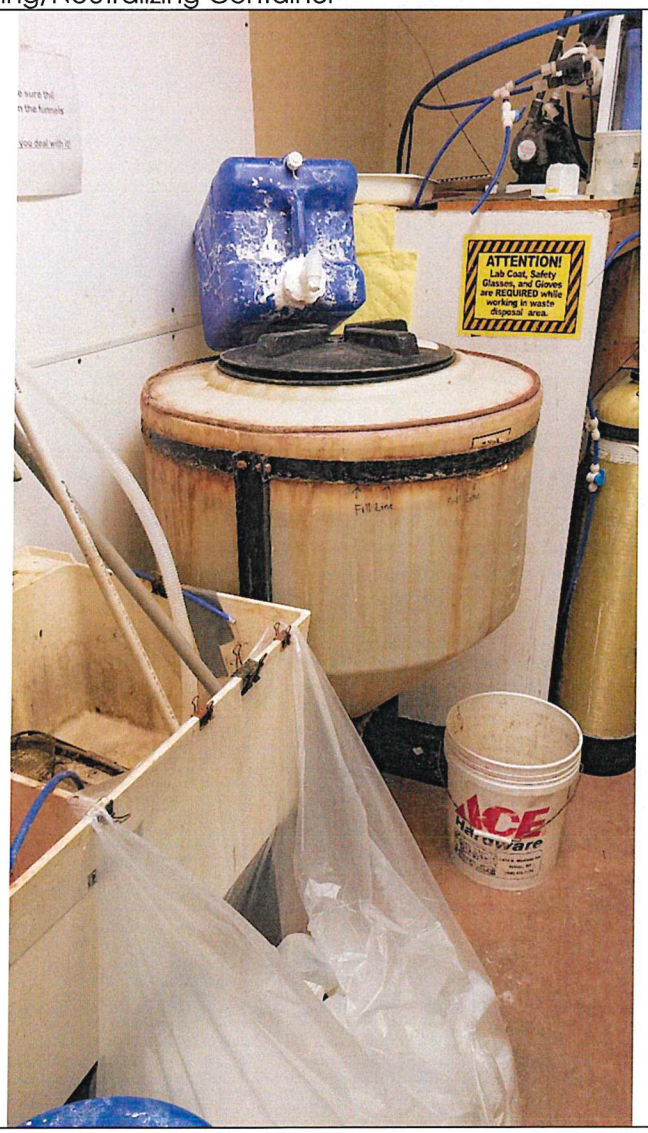

Photo 2: Dry chemical storage in the laboratory

Photo 3: Safety shower with floor drain in laboratory area

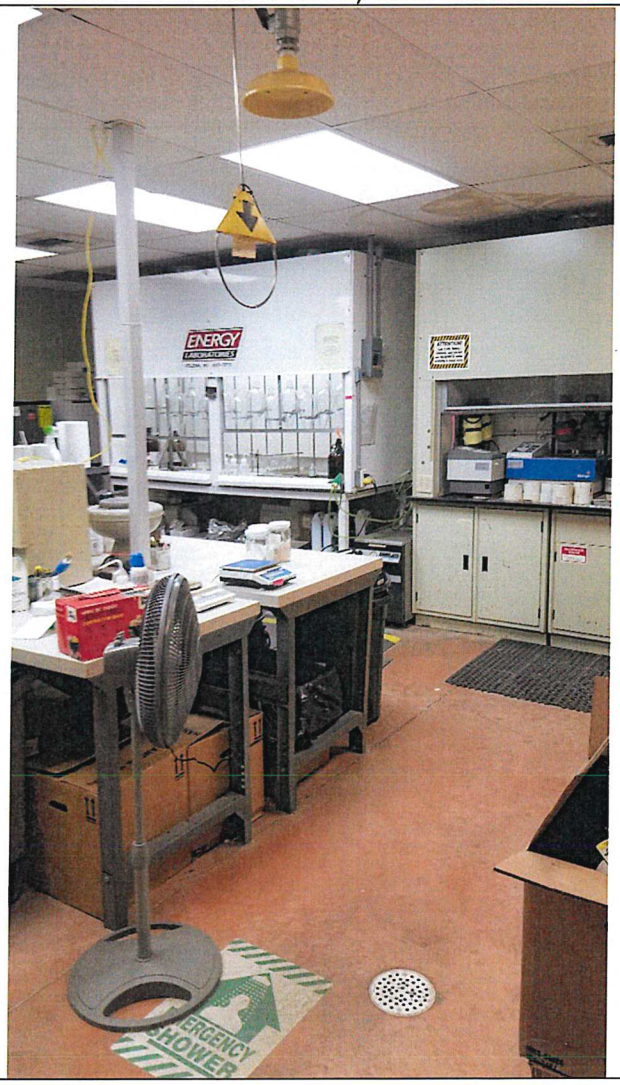

Photo 4: Inside Hazardous Waste Storage

Photo 5: Outside waste storage with secondary containment